

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

TYLER MILLER, an individual,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	3:18-cv-00562-SB
STEVE WATSON, an individual,	)	
JEFFREY DICKERSON, an individual,	)	
STEVE SALLE, an individual, JOHN	)	
DOE DEFTS. 1-5, AKIN BLITZ, an	)	
individual, and BULLARD LAW, P.C.,	)	
an Oregon professional corporation,	)	
	)	
Defendants.	)	
	)	

DEPOSITION OF  
CHANDRA MARIE EGAN  
Taken in behalf of the Plaintiff

\* \* \*

February 4, 2020  
1000 SW Broadway, Suite 2000  
Portland, Oregon

Ashley L. Aronson  
Court Reporter

Chandra Egan

February 4, 2020

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## 1 APPEARANCES:

2 For the Plaintiff: MR. JOHN D. OSTRANDER  
 Attorney at Law  
 3 707 SW Washington Street  
 Suite 1500  
 4 Portland, Oregon 97205  
 503-224-7112  
 5 john@eoplaw.com

6 For the Defendant, MS. BETH PLASS  
 Watson: Attorney at Law  
 7 111 SW Columbia  
 Suite 1100  
 8 Portland, Oregon 97201  
 503-517-2408  
 9 bplass@mershanlaw.com

10 For the Witness, MR. ANDREW WEINER  
 Egan: Attorney at Law  
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 12 Portland, Oregon 97205  
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 13 atw@hartwagner.com

14 Also Present: (None)

15

## 16 INDEX

17 EXAMINATION BY	PAGE NO.
18 Mr. Ostrander	3 - 33

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## 20 EXHIBITS

21 No. 1 Text messages from 2015	9
22 No. 2 Text messages from 2016	14
23 No. 3 Facebook post	26

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1 PORTLAND, OREGON; TUESDAY, FEBRUARY 4, 2020

2 9:30 a.m.

3 \* \* \*

4 CHANDRA MARIE EGAN

5 called as a witness in behalf of the Plaintiff,

6 having first been sworn by the Reporter,

7 testifies as follows:

8 EXAMINATION

9 BY MR. OSTRANDER:

10 Q. Please state your full name.

11 A. Chandra Marie Egan.

12 Q. Have you ever been deposed before?

13 A. No.

14 Q. You understand that I'm taking your  
15 deposition this morning?

16 A. Yes.

17 Q. And you understand that you are under oath?

18 A. Yes.

19 Q. And that the court reporter is taking down  
20 everything that is said today?

21 A. Yes.

22 Q. And do you understand that your testimony  
23 today may be used for various purposes throughout this  
24 lawsuit or at trial?

25 A. Yes.

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1 Q. (By Mr. Ostrander) You understand you're  
2 still under oath?

3 A. Yes.

4 Q. So you saw Mr. Watson at this APCO  
5 conference. Did you talk at that time?

6 A. We said hello.

7 Q. Anything else?

8 A. No.

9 Q. And you said you saw him perhaps one other  
10 occasion. Do you recall that?

11 A. Yes.

12 Q. What was that?

13 A. We drove by each other and waved.

14 Q. Anything else?

15 A. No.

16 Q. Do you know Tyler Miller?

17 A. Yes.

18 Q. When did you first meet Mr. Miller?

19 A. I don't remember.

20 Q. Do you remember the circumstances of when you  
21 first met him?

22 A. He was a reserve deputy and I was a  
23 dispatcher.

24 Q. At any time did you consider Mr. Miller a  
25 friend?

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1 A. No.

2 Q. Were you ever on friendly terms with him?

3 A. Yes.

4 Q. Are you still on friendly terms with him?

5 A. No.

6 Q. And why not?

7 A. I chose to start making my personal life and  
8 my professional life separate.

9 Q. Is there anything that triggered the -- any  
10 instance that triggered a termination of considering  
11 Mr. Miller someone that you're on friendly terms with?

12 A. No.

13 Q. I'm going to hand you an exhibit.

14 MR. OSTRANDER: If you can mark this as  
15 Exhibit 1 to this deposition.

16 (Deposition Exhibit No. 1 was marked for  
17 identification.)

18 Q. (By Mr. Ostrander) What I'm handing you  
19 marked as Exhibit 1 are four pages. At the bottom  
20 right-hand corner it says, Egan subpoena 0011 through  
21 0014. Can you identify what these are?

22 A. Text messages between Tyler Miller and I.

23 Q. Okay. And did you -- and it looks like the  
24 ones that are copied here are in the 2015 time period.

25 A. Yes.

Chandra Egan

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## 1 C E R T I F I C A T E

2 STATE OF OREGON )

3 )

4 COUNTY OF MULTNOMAH )

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6 I, Ashley L. Aronson, a Notary Public in and  
 7 for the State of Oregon, certify that the deposition  
 8 of CHANDRA MARIE EGAN occurred at the time and place  
 9 set forth in the caption hereof; that at said time and  
 10 place I reported in Stenotype all the testimony  
 11 adduced and other oral proceedings had in the  
 12 foregoing matter; that thereafter my notes were  
 13 reduced to typewriting under my direction and the  
 14 foregoing transcript, pages 1 through 33, both  
 15 inclusive, contains a full, true and correct record of  
 16 all such testimony adduced and oral proceedings had  
 17 and of the whole thereof.

18 Witness my hand and Notarial seal at  
 19 Portland, Oregon, this 18th day of February, 2020.

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*Ashley Aronson*  
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 ASHLEY L. ARONSON  
 Notary Public for the State of  
 Oregon, residing at Portland  
 Commission No. 979842  
 My Commission Expires: 10/1/2022